



December 10, 2024

BY ECF

Honorable Joanna Seybert
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Jackson v. Nassau County, et al.*, 18 CV 3007 (JS) (AYS)

Your Honor:

I represent plaintiff in the above-referenced action. I write to respectfully request an extension of the deadline for the parties to file the Joint Pre-Trial Order (“JPTO”). The deadline is presently December 20, 2024 and was previously extended thirty days at defendants’ request, on consent.

If it should please the Court, defense counsel represented to the undersigned on October 28, 2024 – and in a letter to the Court that same day – that defendants wished to focus their resources on settlement and not pay counsel fees for the extensive work necessary to prepare the JPTO in a case of this scale. *See* DE #398. The undersigned consented to defendants’ October 28th letter motion based on that representation. Having heard nothing further from defense counsel until today, and with the settlement conference six days away, plaintiff learned this afternoon for the first time that defendants did not intend to follow the Court’s settlement procedures and had shifted their focus to the JPTO, now due in ten days. *See* E-mails, annexed hereto as Exhibit 1; DE #402.

Making matters more challenging for plaintiff, the undersigned is scheduled to undergo back surgery on December 23, 2024 (with a six-week recovery period) and is unable to work at full capacity in the interim. The undersigned has served as lead counsel on this complex matter since it was commenced over six years ago. Under these circumstances, the undersigned is unable to meet the December 20th deadline. The undersigned e-mailed defense counsel seeking their position prior to submitting the instant application, but they have not responded as of this writing.

Accordingly, plaintiff respectfully requests an extension of the JPTO filing deadline from December 20, 2024 to February 14, 2025.

Thank you for your consideration of this request.

Respectfully submitted,
Gabriel P. Harvis
Gabriel P. Harvis

Encl.

cc: Defense Counsel